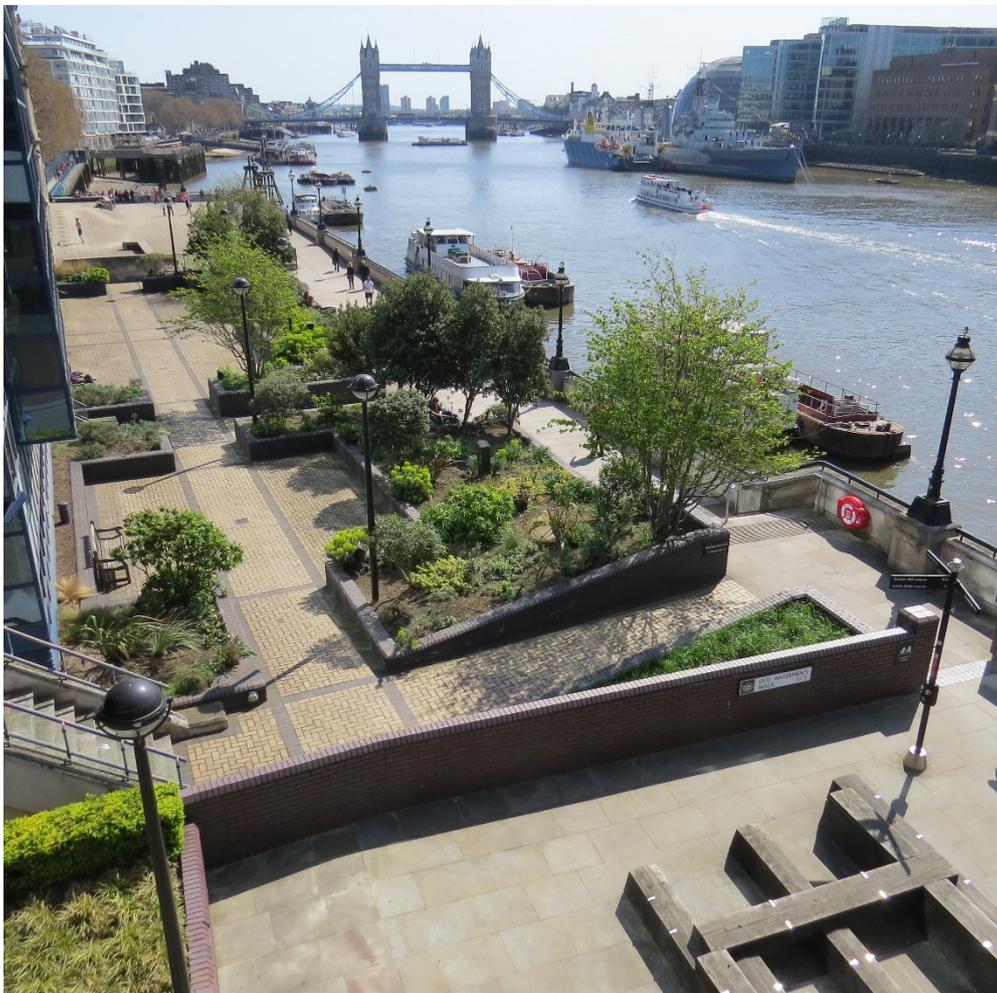


City of London Local Plan
City Plan 2036
Proposed Submission Draft
Topic Paper 6 – KEY AREAS OF
CHANGE



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1. Policy Context

National

The national planning policy context is provided by the National Planning Policy Framework (NPPF), February 2019 and the national Planning Practice Guidance (PPG). The NPPF is prepared by the Ministry of Housing, Communities and Local Government to set out the planning policies for England and how these are to be applied. The NPPF emphasizes the importance of sustainable development that must be taken into account when preparing a local plan.

Paragraph 15 of the NPPF states that the planning system should be genuinely plan-led, adding that “Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

Government Planning Policy Guidance (PPG) is updated regularly, most recently in July 2020 in relation to plan making. The PPG aims to ensure that planning decisions are taken in accordance with the development plan. The PPG states that local plans should set out the vision and framework for development and identify strategic priorities and policies. The provisions of the PPG must be taken into account in the preparation of local plans and are material to decisions on individual planning applications and appeals.

London Plan

The Mayor of London has prepared a revised London Plan which was published on 2nd March 2021. The London Plan is the spatial development strategy for Greater London, including the City of London. The purpose of this plan is to establish strategic development policies for London, clarifying the extent and location of development and providing a framework for public and private agencies in their investment decisions relating to land use.

The City of London lies with the Central Activities Zone (CAZ) identified in the London Plan. Policy SD4: The Central Activities Zone (CAZ) sets out the strategic policy approach towards the CAZ and indicates at part N:

“In Development Plans, boroughs should:

1) define the detailed boundaries of the CAZ, the Northern Isle of Dogs, town centres (including the International centres), CAZ retail clusters, Special

Policy Areas and specialist clusters of strategic functions having regard to the CAZ Diagram shown in Figure 2.16;

2) develop locally sensitive policies to meet this Plan’s objectives for the CAZ.”

Paragraph 2.4.5 states that “Development Plans should set out the appropriate balance between the various CAZ strategic functions in different parts of the CAZ having regard to local circumstances.”

Policy D1: London’s form, character and capacity for growth sets out requirements for boroughs to define an area’s character to understand its capacity for growth, and to plan for growth. Part B of Policy D1 indicates that, in preparing development plans, boroughs should plan for growth by, amongst other things:

“1) Using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan.”

2. Background

Key City Places in the Core Strategy and adopted Local Plan

The concept of providing more detailed guidance in relation to specific parts of the City of London has evolved from the City's Core Strategy, which was adopted in September 2011. The Core Strategy identified the following five 'Key City Places':

- The North of the City;
- Cheapside and St Paul's;
- Eastern Cluster;
- Aldgate; and
- Thames and the Riverside

When preparing the Core Strategy, it was felt there were particular parts of the City which have distinctive roles and different characters, and which faced specific challenges over the period of the Core Strategy. These areas were identified as the above 'Key City Places' and the inclusion of specific policies for these areas was supported through public consultation.

The distribution of development set out in the spatial strategy identified the five Key City Places as the principal locations for the majority of growth in the main land uses of offices, retailing, hotels and housing. This locational emphasis was not intended to restrict development in the rest of the City, but highlighted the importance of the Key City Places in delivering planned development whilst maintaining their distinctive characteristics.

The Core Strategy's vision statement incorporated a brief section on each of the five Key City Places, along with the following strategic objective:

"To ensure that the challenges facing the five Key City Places are met, complementing the core business function of the City, contributing to its unique character and distinguishing it from other global financial districts."

Delivery of the spatial strategy, vision and strategic objectives relating to the Key City Places would be achieved through implementation of specific policies for each area. The Key City Places were defined indicatively in the Core Strategy rather than having defined boundaries.

The same five Key City Places and the same strategic objective were carried forward from the Core Strategy to the currently adopted 2015 Local Plan. In

paragraph 2.7 of the adopted Plan, the purpose of each Key City Place is briefly summarised as follows:

- **The North of the City** – addressing the impact of, and accommodating the growth resulting from, Crossrail, whilst maintaining the area’s mix of uses, enhancing its cultural offer and delivering sustainable development.
- **Cheapside and St Paul’s** – guiding the delivery of significant increases in retail floorspace and enhancing the area’s visitor/cultural offer to restore the area as the City’s ‘high street’.
- **Eastern Cluster** – providing a clear policy framework to guide business development, particularly tall buildings, whilst ensuring a safe and attractive environment.
- **Aldgate** – improving the highway and public realm, and promoting social, environmental and business regeneration, particularly centred on the Mansell Street and Middlesex Street residential estates.
- **Thames and the Riverside**, encouraging a mix of commercial uses which retains existing tranquil areas, promoting environmental improvements, increasing accessibility on land and by river and managing and reducing flood risk.

Delivery progress

Set out below is a brief overview of development and infrastructure activity in the Key City Places since they were originally identified:

The North of the City:

The Crossrail project has been significantly delayed and is now scheduled to open in 2022. However, Farringdon Station, one of two serving the North of the City, was the first in central London to be handed over to TfL in March 2021. Notwithstanding the delay to Crossrail, there has been substantial development activity in this part of the City over the last decade, including major office-led developments at Plumtree Court, 25 Shoe Lane for Goldman Sachs, at 5 Broadgate for UBS, at 100 Bishopsgate and at London Wall Place. In addition, residential developments have included the Milton Court and Roman House schemes in the Barbican and Golden Lane area and the Barts Square scheme in Smithfield. There has been significant investment in state-of-the-art medical facilities at St Bartholomew’s Hospital and the Culture Mile initiative has been launched to add further cultural vibrancy to the north-west corner of the City.

Cheapside and St Paul's:

The major One New Change retail and office development opened in October 2010, shortly before the adoption of the City's Core Strategy. Since then a range of commercial developments have been completed including the Bloomberg office development, which includes the London Mithraeum Museum, the Ned hotel and Members Club at Poultry and an office scheme at 1 King William Street. The Cheapside Business Alliance was established as the City's first Business Improvement District (BID) in 2015. An experimental safety scheme was introduced at Bank Junction in 2017, which has now been made permanent, and there are plans for a wider series of transport and public realm enhancements to transform the look and feel of this key junction.

Eastern Cluster:

The Eastern Cluster includes the core of the City's banking and insurance industries and contains the greatest density of businesses and jobs in the Square Mile. It has successfully attracted a substantial amount of investment and development activity in the last decade, which looks set to continue through the 2020's and beyond. Between 2011/12 and 2019/20, 16% of all completed office floorspace was in the Eastern Cluster and at the current time approximately half of the City's office development pipeline is projected to be delivered in this area. As the name implies, the area contains a cluster of tall buildings which form part of a distinctive skyline. Tall buildings completed in the last decade include the Leadenhall Building ('The Cheese grater'), 52 Lime Street ('The Scalpel'), 70 St Mary Axe ('The Can of Ham'), 22 Bishopsgate and 100 Bishopsgate. As of 31st March 2020, there were 16 tall buildings (75m+ AOD) in the Eastern Cluster together with 9 more in the planning pipeline.

Aldgate:

There have been significant improvements to the area in recent years, with the former Aldgate gyratory being removed and a new square (Aldgate Square) being created, which includes a café, toilets created and associated public realm improvements. Completed developments include a hotel at 9 Aldgate High Street and major mixed-use development is currently under construction in the Minories area, which will comprise a new hotel, office building and residential building. In April 2020, the cross-boundary Aldgate Connect was established as the City's second BID.

Thames and the Riverside:

Redevelopment and refurbishment have taken place along some parts of the City's riverside, such as the residential scheme at Sugar Quay, and permission has been granted for commercial schemes at prominent sites such as Millennium Bridge House and Seal House. Other changes have included the

installation of a new public staircase to link London Bridge with the Riverside Walk, which has greatly improved the public realm and access to the riverside. Construction of the Thames Tideway Tunnel is progressing, which will include a significant new area of public realm at Blackfriars Bridge Foreshore. As part of this project, Blackfriars Millennium Pier was relocated downstream to a new location.

3. Key Areas of Change

Background

The Local Plan Issues and Options consultation in autumn 2016 sought views on whether the concept of Key City Places should be retained in the new Plan and whether they should continue to focus only on areas where significant change is expected. Suggestions were also invited on whether there were other areas of the City that would benefit from a specific policy focus.

Those respondents who commented on this issue supported the concept of place-based policies, with no-one suggesting they should be removed from the Plan. Stakeholders that supported the concept included the Mayor, the City Property Association and Historic England, albeit that Historic England expressed concerns that the extent and justification for the current Key City Places appeared to be driven by the demand for development and its form, rather than by an evaluation of their historical development and resulting characteristics. Suggestions for new areas, while limited in number, focused on the western part of the City.

The Integrated Impact Assessment assessed the options of retaining the Key City Places, identifying Key City Places to cover the whole City or identifying new Areas of Change where change is expected during the Plan period. The IIA recognised that the existing policies across all the Key City Places had been positive in terms of attracting funding for improvements to transport and open spaces, and concluded that identifying new areas of change would have the greatest potential to be effective in influencing development, transport and the public realm.

Having considered consultation responses and other evidence, the City Corporation decided to retain place-based policies in the Local Plan as they help to draw attention to the fact that those areas are likely to experience significant change. It was considered preferable to continue to focus attention only on the main areas of change. If place-based policies were to be prepared for each area of the City, this might reduce the overall effectiveness of the Plan as it could dilute the ability of these policies to assist with the prioritisation of investment decisions. It was decided to rename the Key City Places as Key Areas of Change to better reflect their purpose.

The Local Plans Sub-Committee considered whether to denote these areas on the Policies Map, noting that this would provide greater clarity for users of the Plan but would reduce flexibility and could lead to arguments about

whether specific sites on the edge of these areas should or should not be included within them. Members concluded that it is preferable to continue to denote them indicatively on the Key Diagram.

Initially five Key Areas of Change were identified, at Smithfield and Barbican; Eastern City Cluster; Aldgate and Tower; Blackfriars and the Pool of London. Subsequently it was decided to add two further Key Areas of Change centred on Fleet Street and the area around Liverpool Street Station. It was agreed that there was no need to retain the Key City Place covering Cheapside and St Paul's since most of the changes originally anticipated had already occurred.

Accordingly, seven Key Areas of Change were included in the Draft City Plan 2036 published for consultation in November 2018, together with an overarching policy applying to the whole of the City's riverside. Comments received in response to these Draft Plan policies were broadly supportive and largely focused on matters of detail in relation to the individual areas, although Historic England commented that the emerging policies for the Key Areas of Change should be more closely aligned to relevant evidence.

What are Key Areas of Change?

As explained above, the Key Areas of Change will replace the Key City Places in the adopted Local Plan. They are areas of the City of London which are likely to experience significant change over the City Plan 2036 period and which present opportunities or challenges that warrant a specific policy focus. Table 2 in the Proposed Submission Draft Plan sets out an indicative spatial distribution of development during the Plan period, which shows that the majority of office, housing, retail and hotel development is expected to take place in these areas.

Even within such a geographically small area as the City of London, each of the Key Areas of Change has a distinctive history and character and it is important that change reinforces rather than diminishes their local distinctiveness. For instance, these areas differ in terms of their built form, including the height, age, design and appearance of the building stock; in terms of the uses they contain; and in terms of the accessibility, character and function of the open spaces and public realm within them. Given their differing characters, each of the Key Areas of Change requires a bespoke policy approach to ensure that the scale and form of development and the mix and balance of uses are appropriate.

The process of change is at different stages within the seven areas identified. For instance, intensification of the City Cluster has been taking place over the past 20 years and is already clearly visible in the scale of development and the evolving skyline. In other areas, while some development has come forward in recent years, there are significant proposals which are yet to be implemented or are still at an early stage in the planning process. At the opposite end of the spectrum is Blackfriars, where limited change to the built environment has occurred since the post-war era and where redevelopment is likely to be a medium or longer-term option.

As well as providing a framework to bring forward key development opportunities, the Key Areas of Change policies are intended to promote improvements to infrastructure, transport and the public realm, for instance by providing a strategic context for the development of projects and funding bids. In some cases, infrastructure projects such as the Elizabeth Line or the Thames Tideway Tunnel are important drivers for change in these areas.

For the above reasons, the Key Areas of Change are considered to be integral to the delivery of the City Plan’s vision, strategic objectives and spatial strategy, helping to distinguish the City of London from other global business centres as set out in the relevant strategic objective:

“To ensure that the challenges facing the Key Areas of Change are met, complementing the core business function of the City, supporting the development of its global business offer and world-class cultural, heritage and creative facilities and distinguishing the City from other global centres.”

Why have these areas been identified?

The seven Key Areas of Change identified in the Proposed Submission Draft City Plan are:

- Aldgate, Tower and Portsoken;
- Blackfriars;
- City Cluster;
- Fleet Street and Ludgate;
- Liverpool Street;
- Pool of London; and
- Smithfield and Barbican.

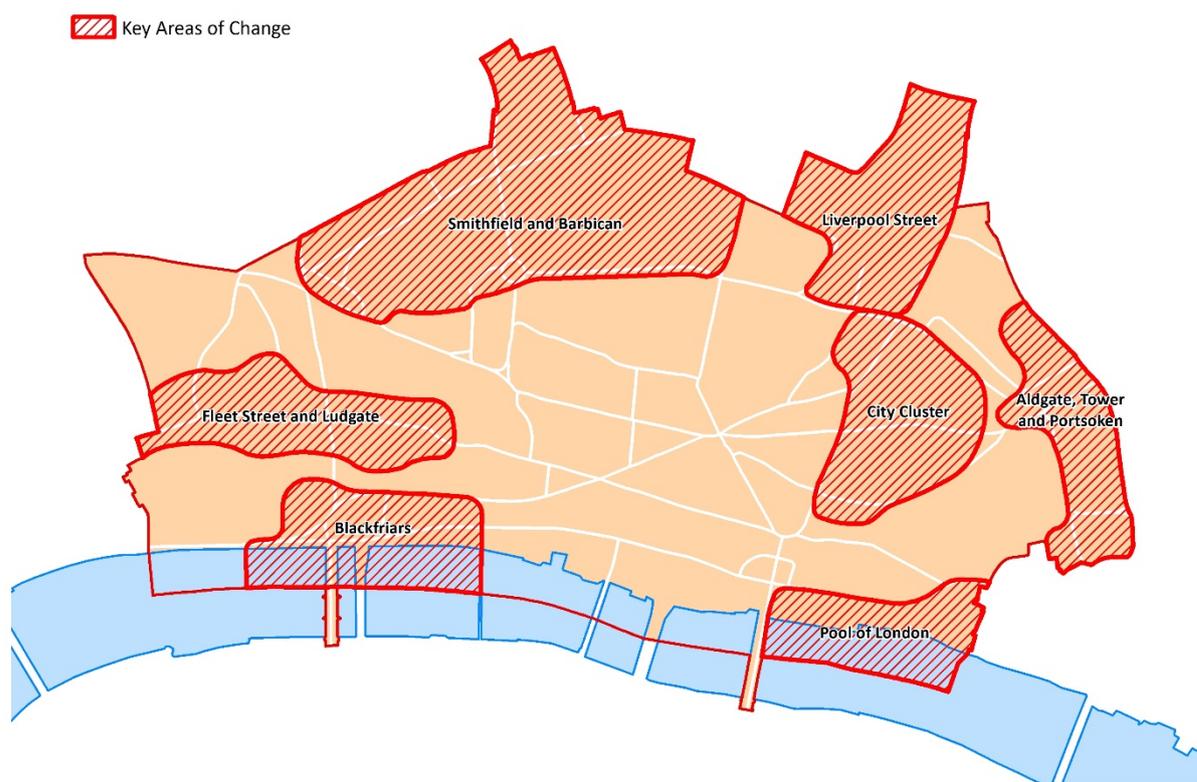


Figure 1: Location of the Key Areas of Change

A brief outline of the reasons for identifying these Key Areas of Change is set out below. However, more detailed supporting information is contained in a series of evidence papers for the individual areas which serve as appendices to this topic paper. These papers provide a context for the relevant policies by summarising the history, character, land uses and development pipeline in each area.

Aldgate, Tower and Portsoken (see Appendix 6A):

The Aldgate, Tower and Portsoken Key Area of Change is located adjoining the eastern boundary of the City and the southern edge of the area is adjacent to the Tower of London. This area will be promoted as a mixed-use area with development that balances the competing needs of residents, workers and visitors. There have been considerable improvements to the area in recent years, with Aldgate Square enhancing the public realm and improving air quality. There are opportunities to improve other parts of the area such as the historic Petticoat Lane Market, celebrating its character and history and improving the visitor experience. This area has one of the lowest proportions of open space in the City, therefore additional open space is especially important both at street level and at higher levels through the provision of accessible roof gardens/terraces. Further transport and public realm

enhancements will be promoted, including improvements to interchange between rail, underground and DLR stations, and improved connections to the Tower of London, the riverside and the neighbouring London Borough of Tower Hamlets.

Blackfriars (see Appendix 6B):

The Blackfriars Key Area of Change is located along the riverside in the south-west of the City, between the Temples legal district and Millennium Bridge. It is envisaged that redevelopment or refurbishment of existing buildings, many of which were constructed in the post-war years, would provide new high-quality office and commercial accommodation. The Thames Tideway Tunnel works will create a large new area of public realm west of Blackfriars Bridge. Active frontages will be sought to add vibrancy to this area, along with improved connections to and from the Riverside Walk and public realm enhancements.

City Cluster (see Appendix 6C):

The City Cluster Key Area of Change in the east of the City contains a cluster of tall office buildings which form a distinctive and recognisable skyline. It is a world-renowned centre for financial and insurance services, although it accommodates an increasingly wide range of business occupiers. Many tall buildings are under construction or have been permitted but not yet commenced. This area also contains a range of heritage assets, including the Victorian Leadenhall Market which provides a key retail use in the heart of the cluster. The City Cluster is expected to accommodate a significant proportion of the City's future growth in office floorspace, together with complementary land uses. Key issues include enhancing the streets and spaces to improve connectivity into and through the cluster, implementing area-wide security measures and introducing new approaches to freight and servicing. This area has one of the lowest proportions of open space in the City, therefore additional open space is especially important both at street level and at higher levels through the provision of accessible roof gardens/terraces.

Fleet Street and Ludgate (see Appendix 6D):

The Fleet Street and Ludgate Key Area of Change in the west of the City has many historic lanes, alleyways, churchyards and spaces that lead off the processional route on Fleet Street and Ludgate Hill which links Westminster to St Paul's Cathedral. This area has been identified as key office occupiers are vacating large buildings and there is an opportunity to promote renewal through appropriate development or refurbishment of those buildings. It is envisaged that there will be significant change due to the potential

development of a new court building, offices and City of London Police Station, which would reinforce the area's role as a centre for judicial and related business. Office-led development will be promoted, together with complementary uses that enhance the area's retail offer and its rich heritage and culture. The character and appearance of the processional route will be protected and enhanced, including views of St Paul's and public realm improvements in the vicinity of the Cathedral to enhance the setting of this iconic building. It is recognised that junction improvements are needed at Ludgate Circus to deliver a safer environment for pedestrians and cyclists.

Liverpool Street (see Appendix 6E):

It is envisaged that the Liverpool Street Key Area of Change in the north-east of the City will witness growth due to a combination of the opening of the Elizabeth Line and redevelopment of Broadgate and surrounding area. There is the potential to further increase vibrancy in the evenings and at weekends by capitalising on good connections to nearby visitor and cultural attractions in Shoreditch, Culture Mile, and at Petticoat Lane and Spitalfields Markets. The development of flexible and collaborative office space will be supported, together with additional retail provision in the Moorgate/Liverpool Street Principal Shopping Centre. Public realm and transportation improvements will be promoted, including to Liverpool Street Station, to enhance the role of this area as a gateway to key destinations such as Culture Mile, Tech City and the City Cluster.

Pool of London (see Appendix 6F):

The Pool of London Key Area of Change is a historic riverside area in the south-east of the City between London Bridge and Tower of London. It is envisaged that several key buildings are likely to be vacated in the short term, providing an opportunity for significant improvement to buildings and the public realm, and enhancements to heritage and cultural assets. The area will be renewed through the refurbishment and redevelopment of buildings, promoting office-led mixed commercial uses with retail, leisure and cultural uses and active frontages to increase vibrancy. Improved connections will be sought to and from the riverside and the Tower of London, along with enhancements to the Riverside Walk including the removal of car parking areas upon redevelopment.

Smithfield and Barbican (see Appendix 6G):

The Smithfield and Barbican Key Area of Change in the north-west of the City comprises a vibrant mixed-use area with major cultural attractions and the largest concentration of residential units in the City. Sites within the area include the Barbican, Museum of London, St Bartholomew's Hospital and

Smithfield Market and it is recognised in the London Plan as a strategic cultural area. It is envisaged this area will undergo significant change through the Cultural Mile initiative and the opening of the Elizabeth Line which is expected to result in an increase in visitors. Smithfield and Barbican has been identified as a Key Area of Change to support the ambition of the Culture Mile to enable a distinctive area for creative enterprises and cultural organisations and artists. Major projects include the proposed relocation of the Museum of London to Smithfield, consequent redevelopment of the Museum's current site and the potential re-use of the Smithfield Market buildings should the Market relocate. There are further opportunities within this area to provide a greater cultural offer and differentiated workspace offer through sensitive change, together with residential development. Transport and public realm improvements will be promoted, and an interim zero emission street has been introduced on Beech Street to improve air quality.

How will the Key Areas of Change be delivered?

The Infrastructure Delivery Plan (IDP) sets out the current and expected distribution of development for the main land uses of offices, housing, retail and hotels, illustrating the scale of growth that could take place within the Key Areas of Change and the rest of the City (See Tables 1-4). The indicative figures are based on the development pipeline and known pre-application discussions at the time of publication, together with the capacity and suitability of the Key Areas of Change for different land-uses. The IDP also provides details of proposed infrastructure projects within each Key Area of Change.

A range of other published reports provide more details regarding particular development, transportation or public realm proposals in the Key Areas of Change, examples of which include the Culture Mile Look and Feel Strategy (2018) and the City Cluster Vision (2019). Further relevant documents that are due to be published include the area-based Healthy Streets Plans, which will identify a range of measures needed to implement the Transport Strategy.

Where appropriate, the City Corporation will prepare further planning guidance to support the delivery of the vision for particular Key Areas of Change. This may take the form of planning briefs or supplementary planning documents and will be produced in partnership with key stakeholders and local landowners.

Appendices

More details regarding each of the proposed Key Areas of Change is contained in the following appendices:

- Aldgate, Tower and Portsoken (Appendix 6A):
- Blackfriars (Appendix 6B):
- City Cluster (Appendix 6C):
- Fleet Street and Ludgate (Appendix 6D):
- Liverpool Street (Appendix 6E):
- Pool of London (Appendix 6F):
- Smithfield and Barbican (Appendix 6G):